

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BEIJING MEISHE NETWORK
TECHNOLOGY CO., LTD.,

Plaintiff

v.

TIKTOK INC., TIKTOK PTE. LTD.,
BYTEDANCE LTD., and BYTEDANCE
INC.,

Defendants.

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NO. 6:21-cv-504-ADA-JCM

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TIKTOK
INC., TIKTOK PTE. LTD., BYTEDANCE LTD., AND BYTEDANCE INC. TO ANSWER
OR OTHERWISE RESPOND TO SECOND AMENDED COMPLAINT**

Defendants TikTok Inc., TikTok Pte. Ltd., ByteDance Ltd., and ByteDance Inc. move for a 90-day extension to answer or otherwise respond to Plaintiff Beijing Meishe Network Technology Co., Ltd.’s second amended complaint filed on July 1, 2021 (“Complaint”). The deadline to answer or otherwise respond to the Complaint is currently December 3, 2021. With a 90-day extension, Defendants’ answer or response to Plaintiff’s Complaint would be due on March 3, 2022.

This motion is not brought for the purpose of delay. Rather, this extension is necessary because (1) Defendants have recently retained counsel, and are still in the process of retaining additional counsel due to the intervening Thanksgiving holidays, and (2) must coordinate across the multiple domestic and foreign entities named in the Complaint, and thus need additional time to answer or otherwise respond to the Complaint.

Pursuant to Local Rule CV-7(g), counsel for Defendants have conferred with counsel for Plaintiff. This motion is unopposed.

Accordingly, Defendants request that the Court grant the motion and enter an Order extending the deadline for Defendants to answer or otherwise respond to the Complaint to March 3, 2022.

Dated: December 1, 2021

Respectfully submitted,

PAUL HASTINGS LLP

By: /s/ Yar R. Chaikovsky

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Attorneys for Defendants
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BYTEDANCE LTD., and BYTEDANCE INC.

CERTIFICATE OF CONFERENCE UNDER LOCAL RULE CV-7(G)

I hereby certify that counsel for Defendants conferred with counsel for Plaintiff that counsel for Plaintiff confirmed Plaintiff does not oppose the relief sought by this motion.

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/ Yar R. Chaikovsky

Yar R. Chaikovsky